

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE:

JAMES A JONES

Debtor

Case No. 20-11460-amc

Freedom Mortgage Corporation,

Movant

Chapter 13

vs.

JAMES A JONES

Kareema J. Walker Respondents

11 U.S.C. §362 and §1301

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Freedom Mortgage Corporation (hereinafter “Movant”) has filed a Motion for Relief with the Court to permit Movant to Foreclose on 6323 W Jefferson Street, Philadelphia, PA 19151.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **March 14, 2022** you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant’s attorney:

Brock and Scott, PLLC
8757 Red Oak Boulevard, Suite 150
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **March 30, 2022 at 11:00 AM**, in **Courtroom 4**, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 204, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

February 28, 2022

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: JAMES A JONES Debtor(s)	Case No. 20-11460-amc
Freedom Mortgage Corporation, Movant	Chapter 13
vs. JAMES A JONES Kareema J. Walker Respondents	11 U.S.C. §362 and §1301

CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Motion and Motion for Relief, by regular mail or electronic means on February 28, 2022.

JAMES A JONES
6323 W JEFFERSON ST
PHILADELPHIA, PA 19151-4533

Brandon J Perloff
Brandon Perloff PC
315 North 12th Street, Suite 204
Philadelphia, PA 19107

Kareema J. Walker
6323 W. Jefferson Street,
Philadelphia, PA 19151

Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Matthew Fissel
Matthew Fissel
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